



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework and to
Examine the Integration of Greenhouse Gas Emissions
Standards into Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

**NORTHERN CALIFORNIA POWER AGENCY
MOTION FOR PARTY STATUS**

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October 18, 2006

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Pursuant to Rule 1.4 of California Public Utilities Commission ("Commission") Rules of Practice and Procedure,¹ the Northern California Power Agency² (hereinafter "NCPA") hereby moves the Commission for Party status in the above captioned proceeding.

I. ENTITY MAKING THE MOTION

NCPA is a joint powers agency, created by a joint powers agreement dated July 19, 1968, as amended, entered pursuant to Chapter 5 (commencing with § 6500) of Division 7 of Title 1 of the California Government Code. NCPA was formed to aid community-owned utilities, and provides support for the electric utility operations of the 18 publicly-owned utility members, located in Northern and Central California, and is engaged in the generation and transmission of electric power and energy. NCPA owns and operates power plants in California; collectively, NCPA's power plants have a 96% emission-free generation portfolio.

II. NCPA'S INTERESTS IN THIS PROCEEDING

NCPA is fully committed to the goals articulated in Senate Bill (SB) 1368. Because both the California Energy Commission (CEC) and this Commission will be working on a very short time frame to establish and implement greenhouse gas (GHG) emissions standards, and because

¹ NCPA sites to the Rules effective September 13, 2006.

² NCPA is a Joint Powers Agency whose members include the cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, and Ukiah, as well as the Bay Area Rapid Transit District, Port of Oakland, the Truckee Donner Public Utility District, and the Turlock Irrigation District, and whose Associate Members are the Lassen Municipal Utility District, Plumas-Sierra Rural Electric Cooperative, and the Placer County Water Agency.

those standards will have statewide implications, NCPA seeks to participate in this proceeding to insure that the entire process is undertaken with the greatest amount of necessary information from the onset.

Specifically, NCPA's interests in this proceeding stem from the fact that SB 1368 requires the CEC to establish a GHG performance standard for all baseload generation of local publicly owned electric utilities (POUs) by June 30, 2007. (Public Utilities³ code § 8341(e) and (f)) Similarly, SB 1368 requires this Commission to establish a GHG performance standard for the load serving entities defined in § 8340(h). (§ 8341(d))

Furthermore, given the aggressive schedule established in SB 1368, the legislation also stated that the "[CEC] may, in order to ensure compliance with the greenhouse gases emission performance standard by local publicly owned electric utilities, apply the procedures adopted by the [CPUC] to verify the emissions of greenhouse gases from baseload generation pursuant to subdivision (b)." (§ 8341(c)(2), referencing § 8341(b)(3) regarding procedures for the verification of emissions to be adopted by this Commission for load serving entities.) While the CEC's discretion to use verification procedures adopted by this Commission is very narrow, it does have the ability to impact NCPA's interests.

III. NCPA'S CONTENTIONS ARE PERTINENT TO THE ISSUES PRESENTED IN THIS PROCEEDING

As noted above, NCPA's participation is directly related to the issues already before the Commission in this proceeding; namely establishing and implementing a GHG performance standard that furthers the State's goal of reducing total GHG emissions.

IV. APPEARANCES FOR NCPA

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³ Unless otherwise noted, all code section references shall be the Public Utilities code.

V. CONCLUSION

For the reasons set forth herein, and in compliance with Rule 1.4, NCPA moves for Party status in this proceeding, with all rights attendant to such status.

October 18, 2006

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **NORTHERN CALIFORNIA POWER AGENCY MOTION FOR PARTY STATUS** on all known parties to R.06-04-009 by transmitting an e-mail message with the document attached, to each party named in the official service list, last revised October 17, 2006. For those parties that did not provide an email the document was served by first-class mail.

Executed this 18th day of October, 2006.

/s/ Katie McCarthy
Katie McCarthy